



**Community Relations Plan  
RCRA Facility Investigation  
Wellman Dynamics Corporation  
Creston, Iowa  
USEPA ID No. IAD065218737  
Revision 1**

**October 2006**

**Prepared For:**

**Wellman Dynamics Corporation  
1746 Commerce Road  
Creston, Iowa 50801**

**Prepared By:**

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Madison, Wisconsin 53718**

**BT² Project #2631**

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## **1.0 INTRODUCTION**

### 1.1 Purpose

This Community Relations Plan (CRP) has been prepared for the Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) of the Wellman Dynamics Corporation (WDC) facility. The CRP represents a portion of the RFI Workplan for the WDC facility.

The purpose of the CRP is to provide guidance to project personnel, regulators, and the public as to how information generated through RFI activities will be shared. The CRP outlines procedures for disseminating information to the public, including information bulletins, public meetings, and posting information in public locations.

The RFI Workplan and CRP were prepared in accordance with the requirements of the Administrative Order on Consent (Order) issued by the United States Environmental Protection Agency (USEPA) that became effective on January 23, 2004.

### 1.2 RFI Workplan Organization

This CRP is one of six documents that compose the WDC RFI Workplan. The other five Workplan component documents include:

- Project Management Plan
- Sampling and Analysis Plan/Quality Assurance Project Plan (SAP/QAPP)
- Data Management Plan
- Health and Safety Plan
- Risk Assessment Workplan

These component documents reference each other and should be reviewed in combination to obtain a complete understanding of the proposed RFI.

### 1.3 Project Information

|                   |   |
|-------------------|---|
| Facility Name:    | Wellman Dynamics Corporation            |
| EPA ID No:        | IAD065218737                            |
| Facility Address: | 1746 Commerce Road<br>Creston, IA 50801 |

USEPA Project Coordinator: Patricia Murrow  
ARTD/RCAP  
U.S. Environmental Protection Agency  
901 North 5th Street  
Kansas City, KS 66101  
913-551-7627

Facility Project Coordinator: Joe Haller, Environmental Engineer  
Facility address above  
641-782-8521, ext. 206

Corporate Contact: E. Jonathan Jackson  
Environmental and Safety Compliance Director  
Fansteel, Inc.  
Deerbrook Corporate Center, Suite 200  
570 Lake Cook Road  
Deerfield, IL 60015  
847-689-4900, ext. 553

Consultant Contact for RFI Workplan: Sherren Clark, P.E., P.G., Project Manager  
BT<sup>2</sup>, Inc.  
2830 Dairy Drive  
Madison, WI 53718-6751  
608-216-7323

## **2.0 FACILITY BACKGROUND**

A complete description of the site history, operations, and environmental conditions at the facility can be found in the Final Current Conditions Report (CCR)(BT<sup>2</sup>, 2005). The following subsections provide a summary of site background.

### **2.1 Facility Description and History**

WDC is located at the northwest corner of the intersection of U.S. Highway 34 and Osage Street in the Creston Industrial Park in Union County, Iowa. The facility is located just outside of the City of Creston corporate limits in the Township of Highland, but is served by City water and sewer. The WDC property includes an area of approximately 42 acres.

The facility was originally constructed in 1965 as an aluminum and magnesium foundry and has been used for the same purpose since that time. The facility was initially owned by Hills McCanna Corporation of Chicago, Illinois, and then was operated by a variety of owners from 1971 to 1985. In

1985, Beatrice Corporation sold the facility to Fansteel, Inc. WDC is a wholly owned subsidiary of Fansteel, Inc.

WDC manufactures magnesium and aluminum alloy castings primarily for the aerospace industry. Products include complex components for helicopters, missiles, rocket engines, jet engines, and structural parts for both military and commercial aircraft, such as the Bell/Boeing V-22 Tilt Rotor, the Rolls Royce/BMW BR710 jet engine, and the Pratt and Whitney alternate turbopump for the Space Shuttle main engines. Non-aerospace applications have included 1,600-pound magnesium transfer pumps for the oilfield industry and porosity-free castings for computer chip manufacturing. Various magnesium and aluminum alloys are cast to achieve specific final properties.

The facility includes two main buildings and several smaller outbuildings. The main production building is approximately 285,000 square feet in area, and houses the administrative offices, foundry, and supporting operations. The second major building is the pattern storage and warehouse building, located north of the main production building. Outbuildings include several storage sheds, the effluent sewer shed, and the guard shack.

Foundry operations are conducted in the main production building. Foundry operations include melting the solid metal, pouring the liquid metal into a mold, and allowing the metal to solidify. The solidified metal part, known as a casting, goes through several cleaning, inspection, and testing steps prior to shipping to the customer.

## 2.2 Environmental Issues and RFI Areas of Investigation

The CCR describes in detail the known contaminants in soil and groundwater at the WDC facility and the areas in which the contaminants are found. The RFI will focus on investigating the degree and extent of contamination at the facility and evaluating the risk posed to human health and the environment by site contaminants.

The RCRA Facility Assessment performed by a USEPA contractor in 1993 identified 12 solid waste management units (SWMUs) at the WDC facility. The CCR includes a preliminary evaluation of the current status and the need for further action at the 12 SWMUs plus two additional areas of concern (AOCs) identified since the RFA was performed. Of the 12 SWMUs, nine are proposed to be included in the RFI. The SWMUs and AOCs are summarized in **Table 1**.

### 2.3 RFI Schedule

The RFI schedule is provided in the Project Management Plan as **Figure 1**.

## **3.0 COMMUNITY RELATIONS**

### 3.1 Mailing List

WDC will maintain and update a mailing list for distribution of information related to the RFI. The mailing list will include the following persons or organizations:

- Residents and owners of land adjacent to the facility
- City of Creston media representatives
- City and county government representatives

Community members may contact the WDC facility contact or USEPA representative listed below to request inclusion on the mailing list. The mailing list will be developed near the beginning of the RFI and maintained and updated as the RFI progresses. The mailing list will be used to distribute fact sheets.

### 3.2 Facility Contact

A WDC facility representative has been designated by WDC to be a point of contact for the public with questions, comments, or concerns about the RFI. The facility contact is:

Joe Haller  
Environmental Engineer  
Wellman Dynamics Corporation  
1746 Commerce Road  
Creston, IA 50801  
Phone: 641-782-8521, ext. 206

### 3.3 Information in the Public Domain

All reports, correspondence, and other submittals to the USEPA become part of the public domain and are available to the public. The agency contact for this project is:

Patricia Murrow  
ARTD/RCAP  
U. S. Environmental Protection Agency  
901 North 5<sup>th</sup> Street  
Kansas City, KS 66101  
Phone: 913-551-7627  
Fax: 913-551-9627

Information in the public domain may be obtained by filing a request under the Freedom of Information Act. Individuals or groups may also contact the USEPA representative with questions or concerns regarding the RFI.

### 3.4 Fact Sheets

WDC will prepare fact sheets to update the public on the status of the RFI. The first fact sheet will be prepared following completion of the RFI Workplan, within 60 days of USEPA approval of the Workplan. Another fact sheet will be prepared at the completion of the RFI activities, within 60 days of USEPA approval of the final RFI Report. The fact sheets will be distributed to the individuals and groups on the mailing list.

### 3.5 Public Comment

As outlined in the Administrative Order on Consent, USEPA will provide the public with an opportunity to review and comment on the final draft of the Corrective Measures Study (CMS) Report. The CMS will be completed after the RFI if the results of the RFI indicate that corrective measures are necessary to protect public health and the environment.

## **4.0 REFERENCES**

BT<sup>2</sup>, Inc., 2005, Final Current Conditions Report, Wellman Dynamics Corporation, Creston, Iowa, USEPA ID No. IAD065218737, June 2005.

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**TABLE**

|   |   |
|---|---|
| 1 | Solid Waste Management Units and Areas of Concern |
|---|---|

**Table 1**  
**Solid Waste Management Units and Areas of Concern**  
**Wellman Dynamics Corporation / Community Relations Plan**

| <b>SWMU or AOC Designation</b> | <b>Name</b>                                      | <b>Environmental Issues</b>   | <b>RFI Status</b>  |
|--------------------------------|--|---|--|
| SWMU 1                         | Former Wastewater Treatment Sludge Storage Area  | Wastewater treatment sludge formerly stored in this area contained chromium above regulatory levels.  | No further action required. USEPA certified closure of this unit in 2003.  |
| SWMU 2                         | Current Wastewater Treatment Sludge Storage Area | Wastewater treatment sludge currently stored in this area contains chromium above regulatory levels and is properly managed as a hazardous waste. There is no evidence of a release to the environment from this storage area.  | Limited soil sampling will be performed to confirm that there has not been a release to the environment.   |
| SWMU 3                         | Spent Solvent Storage Area                       | A small number of drums of spent solvents, including tetrachloroethylene, were formerly stored at this location inside the main production building. There is no evidence of a release to the environment from this area and a very low potential that a release would have occurred.                                       | No further action required.  |
| SWMU 4                         | Spent Chromic Acid AST and Containment Structure | Spent chromic acid was formerly stored in this above-ground storage tank (AST). Past investigation has indicated that chromium contamination is present in the soil and groundwater in the immediate vicinity of the former AST. Contaminated soil has been excavated from this area and groundwater monitoring is ongoing. | Additional investigation will be completed to evaluate the nature, extent, and potential exposure risks associated with the chromium remaining in soil and groundwater in this area. |

**Table 1 (continued)**  
**Solid Waste Management Units and Areas of Concern**  
**Wellman Dynamics Corporation / Community Relations Plan**

| <b>SWMU or AOC Designation</b> | <b>Name</b>                      | <b>Environmental Issues</b>   | <b>RFI Status</b>   |
|--------------------------------|----------------------------------|---|---|
| SWMU 5                         | Spent Chromic Acid Transfer Tank | This mobile transfer tank was formerly used to transport spent chromic acid from the process tank where it was used in the plant to the spent chromic acid AST. There is no documentation of a release for the transfer tank.   | No further action required specifically for this SWMU. If a release did occur, it most likely would have occurred in the loading or unloading areas, which will be investigated under SWMUs 4 and 10. |
| SWMU 6                         | Wastewater Treatment System      | The wastewater treatment system treats waste acids from the etch line prior to discharge to the city sewer system, including hydrofluoric, nitric, sulfuric, and chromic acids. There are no known releases to the soil or groundwater, but there may be a potential for a release depending on the integrity of the containment systems. | Additional investigation will be completed to determine if a past release has occurred.   |
| SWMU 7                         | Waste Methanol Drum Storage Area | A small number of drums of waste methanol (spent solvent) were formerly stored in this area. There is no evidence of a past release and a limited potential that a release would have occurred. Even if a release had occurred, methanol breaks down rapidly in the environment and would not likely be present today.                    | Limited soil sampling will be performed to confirm that there has not been a release to the environment.  |

**Table 1 (continued)**  
**Solid Waste Management Units and Areas of Concern**  
**Wellman Dynamics Corporation / Community Relations Plan**

| <b>SWMU or AOC Designation</b> | <b>Name</b>                         | <b>Environmental Issues</b>  | <b>RFI Status</b>  |
|--------------------------------|-------------------------------------|--|--|
| SWMU 8                         | Former Magnesium Dross Storage Area | A large number of drums of magnesium dross and magnesium-barium dross (foundry waste) were stored in this area awaiting treatment to reclaim magnesium, and spills of dross on the soil surface have been documented. Sampling during the RFA indicated that the soil contains barium and chromium. A portion of the dross storage area is regulated separately by the Iowa Department of Public Health (IDPH) due to radiological constituents.   | Additional investigation will be completed to evaluate the nature and extent of contamination in soil and potentially in groundwater in this area; however, the RFI will not address the area regulated by IDPH, which is the subject of a separate investigation. |
| SWMU 9                         | Magnesium Dross Treatment Area      | The magnesium dross is treated to reclaim scrap magnesium. The treatment process produces a magnesium-hydroxide sludge as the final waste product, which is disposed of in the on-site landfill under a permit from the Iowa Department of Natural Resources (IDNR). Although the treatment is generally performed within a concrete confinement area, there is some potential for a release to the environment because the containment is not complete and because untreated dross is stockpiled in the surrounding area. | Additional investigation will be completed to determine if soil and groundwater in this area have been impacted by the dross and, if so, to evaluate the extent and degree of contamination.   |

**Table 1 (continued)**  
**Solid Waste Management Units and Areas of Concern**  
**Wellman Dynamics Corporation / Community Relations Plan**

| <b>SWMU or AOC Designation</b> | <b>Name</b>               | <b>Environmental Issues</b>   | <b>RFI Status</b>  |
|--------------------------------|---------------------------|---|--|
| SWMU 10                        | Waste Acid Collection Pit | The waste acid collection pit is a concrete pit below the acid etch line in the plant. The pit collects overflow and wastewater from the process and rinse tanks. Acids collected include chromic, hydrofluoric, sulfuric, nitric, and acetic acids. There are no known releases to the environment, but the integrity of the concrete pit is not known.  | Additional investigation will be completed to evaluate the potential of a release to soil and groundwater from this area.  |
| SWMU 11                        | Waste Acid Dump Pit       | Prior to 1971, waste acids were disposed of in the waste acid dump pit, which contained limestone intended to neutralize the acids. This area has been investigated in conjunction with SWMU 4 and it appears that both SWMUs have contributed to a merged area of chromium contamination in the soil and groundwater.  | Additional investigation will be completed to evaluate the nature, extent, and potential exposure risks associated with the chromium remaining in soil and groundwater in this area.   |
| SWMU 12                        | Landfill                  | The landfill is used for disposal of foundry sand, baghouse dust, and treated magnesium dross. A portion of the landfill area is regulated by IDPH due to former disposal of low-level radioactive thorium process sludge. The landfill is permitted and regulated by the IDNR solid waste program. Previous sampling has indicated elevated concentrations of fluoride and sulfate downgradient of the landfill. | Additional investigation will be completed to determine the nature and extent of groundwater contamination downgradient from the landfill area and to evaluate the potential risks associated with the contamination. Other issues associated with the landfill will not be included in the RFI and will continue to be regulated by the IDNR and/or IDPH. |

**Table 1 (continued)**  
**Solid Waste Management Units and Areas of Concern**  
**Wellman Dynamics Corporation / Community Relations Plan**

| <b>SWMU or AOC Designation</b> | <b>Name</b>                                  | <b>Environmental Issues</b>  | <b>RFI Status</b>   |
|--------------------------------|--|--|---|
| AOC A                          | Chlorinated Solvents in Soil and Groundwater | During a 1998 voluntary environmental assessment, chlorinated solvents including tetrachloroethylene (PCE), trichloroethylene, and other chlorinated compounds were detected in soil and groundwater samples collected on-site. In one of the areas where groundwater contamination was detected, a PCE spill occurred in 1998 after the samples were collected and may have added to the solvent contamination this area. | Additional investigation will be completed to define the nature and extent of chlorinated solvent contamination in the soil and groundwater and to evaluate potential exposure pathways and risks.                      |
| AOC B                          | Petroleum Product AST Area                   | ASTs are or were used to store gasoline, diesel fuel, and kerosene in this area. Sampling as part of the 1998 voluntary environmental assessment indicated very low levels of soil contamination and did not detect petroleum contamination in groundwater.  | Although the initial sampling indicated only limited contamination, some additional investigation will be completed to determine the degree and extent of petroleum contamination to soil and groundwater in this area. |

SWMU = Solid Waste Management Unit  
AOC = Area of Concern